



International Federation of
Organic Agriculture Movements –
EU Regional Group

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Working for organic farming in Europe

Mr Jean-François Hulot
Head of Unit, Organic Farming
European Commission
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Brussels, 17 November, 2010

Letter on processing – Annexes VIII and IX of Reg. (EC) No 889/2008 - the first areas to be discussed by the expert group.

Dear Mr Jean-François Hulot,

For years now there has been no substantial revision of the technical details for processing of organic foods. This is mainly relevant for the requirements in article 27 and Annexes VIII and IX of Reg. (EC) No 889/2008.

The IFOAM EU Group wrote on 14th of September 2009 outlining some proposals for change in this area. We would like to add further requests for change to those in that letter, (Copy Attached).

It is the aim of the IFOAM EU Group to keep the Annex VIII short, in line with the principle that organic food should be produced with the minimum use of additives and processing aids, consistent with careful processing practices. Therefore we ask in this letter for the deletion of five substances from List B and C. The further changes proposed will ensure that the lists in Annex VIII (A & B) stay up to date that they take account of general food regulation and technology changes and reflect availability of materials in organic form.

On the other hand development with new processing techniques and processing aids is an on-going process. Until now there is little attention to the needs of the organic processing sector to develop new processing and additive use strategies, which cope with the fast growing diversity of organic foods. IFOAM EU is aware that the fast growth of organic processed food needs a clear vision and practical criteria on future developments in the area of processing methods and processing aids. IFOAM EU will bring forward coming year a vision and practical criteria, that can serve as guideline for further renewal of processing topics. Furthermore we want to bring to your attention that there might be projects financed in the new Core Organic Programme (final decision in December) on organic food processing, which would give more guidance to the processing industry and the sector.

Due to the fast growing “diversity” of organic foods we think the limitations in the last column of Annex VIII have to be revised to make the substances available for different types of foods on a case-by-case basis and only where the restrictions do not arise from major concerns about the substance itself and the additive in question does not compromise the authenticity of organic products. This will help the organic sector to provide a broad range of high quality organic foods. This case by case approach is an intermediate step until more precise principle and decision criteria, but also related private Codes of Practice for different product groups, have been developed by the private sector.

Annex VIII A

We suggest some correction under “specific conditions” for the following substances in Annex VIII A:

- E 331 Sodium citrate - This should be allowed for plant products too. This substance may be useful to reduce Acrylamide formation in wholesome cereal products. The issue of Acrylamide is very relevant

for consumers because of its' carcinogenic potential. (Add an X under "plant origin"),

- E 551 Silicon dioxide - Depending on the legislative and traditional background in the different member countries it is often not clear what exactly is a spice or herb or what has to be seen as a fruit or vegetable. This causes misunderstanding in the market and problems among the producers. Silicon dioxide is "sand" which is used as anti-caking agent for plant material in powdered form. To allow the substance for all plant products helps overcome this problems. We suggest removal of the wording after "Anti-caking agent" in the conditions
- E 500 Sodium carbonate - The specific conditions should be deleted. Sodium carbonate is a mild alkali substance with is use in different processing operations. At the moment it is allowed as additive for plant products without restrictions. Mostly it is used as the main ingredients for baking powder and added to organic foods in a relatively high percentage. For animal products the use is restricted to 3 specific single products, where Sodium carbonate is working as an buffering substance. Similar milk based products are produced in other EU countries as specialities.

Annex VIII B

We suggest one correction under "specific conditions" for the following substances in Annex VIII B:

- Sodium carbonate should be allowed as processing aid for plant and animal products without limitations (Add an X under "Preparation of foodstuffs of animal origin" and delete the specific condition).

Sodium Carbonate is allowed as additive for plant products without restrictions. Therefore, it is hard to understand why as processing aid this substance should only be used for sugar production. During the last years we find that, for example, in organic starch production or in the production of organic oil Sodium carbonate is in use. These applications are normally understood as use of a "processing aid". Legally speaking this creates a complicated situation because the substances are not permitted for such products as processing aids. This is accepted by several authorities and control bodies because of the contradiction between annex A and B. So we ask here for a correction of the legal background.

We propose the removal of the following substances from Annex VIII B:

- Ethanol,
- Rice Meal,
- Gelatine,
- Vegetable Oils.

These four substances are all widely available in organic form and their continuing use in non organic form as processing aids, is therefore unnecessary and contrary to the principles of organic farming as detailed in Article 4, b 1 of Regulation (EC) No 834/2007. The new additive regulation 1333/2008 in article 3 b) i) excludes "normal food" from falling under the definition of "processing-aids". This change

should be made immediately with appropriate time for change by operators of say one year.

Annex VIII C

We propose the removal of the following substances from Annex VIII C:

- Vegetable Oils

This is for the same reasons detailed immediately above.

Annex IX

Annex IX should also be updated. Many of the substances can be deleted. Therefore in addition to those mentioned in the letter of the 14th of September 2009 we recommend that the following substances are deleted:

1.1 Edible fruits, nuts and seeds:

- gooseberries (*Ribes uva-crispa*)
- raspberries (dried) (*Rubus idaeus*)
- red currants (dried) (*Ribes rubrum*)

1.2. Edible spices and herbs:

- pepper (Peruvian) (*Schinus molle* L)
- safflower flowers (*Carthamus tinctorius*)

2.1. Fats and oils

As detailed in our letter of 14th of September 2009, we think there should be a change in the system. This list should be made into a positive list of oils and fats that are not available in organic quality. Recent investigations show that, in addition to the list in that letter, the following oils are also available in organic quality:

- Onager oil
- Grapeseed oil

In section 2.2 (starches and other products from cereals and tubers) the following sugar should be deleted as it is available in organic form:

- fructose

We trust that these changes can be progressed through SCOF quickly as we do not believe them to be significantly contentious. Alternatively they should be discussed by the new expert group.

As always we remain available for discussion and clarification on any points should this be required.

Yours sincerely

A handwritten signature in dark ink, appearing to read "Marco Schlueter". The signature is written in a cursive, flowing style.

Marco Schlueter
The IFOAM EU Group Director